

**AFFIDAVIT OF SPECIAL AGENT JANET CONNOLLY
IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT**

INTRODUCTION

I, Janet Connolly, a special agent with Homeland Security Investigations, having been duly sworn, do hereby depose and state as follows:

1. I am a Special Agent with the Boston office of the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”). I have been an HSI Special Agent since 2008. I have been assigned to the Child Exploitation / Computer Forensics Group since 2014. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to child exploitation, child pornography, coercion and enticement, and transportation of minors, including but not limited to violations of 18 U.S.C. §§ 2422, 2423, 2251, and 2252A. I have received training in the investigation of child exploitation offenses, including child pornography, and have reviewed examples of child pornography as defined in 18 U.S.C. § 2256. My specialized child exploitation training includes participation in the 2018 Atlanta National Law Enforcement Training on Child Exploitation, the 2016 Dallas Crimes Against Children Conference, and the 2015 New England Cyber Crime Conference.

2. I submit this affidavit in support of a criminal complaint charging Andre W. TILAHUN (YOB: 1993) (“TILAHUN”), of Quincy, Massachusetts, with one count of receipt of child pornography, in violation of 18 U.S.C. § 2252A(a)(2).

3. The statements contained in this affidavit are based in part on: information provided by HSI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of subpoenas; the results of physical surveillance conducted by law enforcement agents;

independent investigation and analysis by HSI agents/analysts and computer forensic professionals; and my experience, training, and background as a Special Agent with HSI. Because this affidavit is submitted for the limited purpose of establishing probable cause to secure a criminal complaint, I have not included each and every fact known to me concerning this investigation. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

STATEMENT OF PROBABLE CAUSE

Background on Federal Search Warrant

4. On April 15, 2021, I obtained a federal warrant authorizing the search of TILAHUN's residence in Quincy, Massachusetts for evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A.

5. As set forth in the search warrant, law enforcement has been investigating the user of the Kik account, "Wolfeofwallstreet," for sending and receiving child pornography on the Kik platform. Law enforcement is aware that the "Wolfeofwallstreet" account participated in the a Kik chatroom where the participants shared child pornography.¹

6. Kik provided law enforcement with the following subscriber information for the "Wolfeofwallstreet" account:

Username: Wolfeofwallstreet

Account Creation: 03/01/2014

E-mail Address: wolfeofwallstreet@gmail.com²

¹ The real names of the chatroom is known to law enforcement but is being anonymized in order to protect the ongoing investigation.

² I have reviewed subscriber information associated with this Gmail account. The account was created on March 2, 2014. There is no listed "Name," "Alternate e-mails," or "Recovery Email." The account was deleted on February 13, 2021 and there is no available IP information.

Name: Mark Wolf

Device Type: Apple iPhone

7. Kik also provided law enforcement with a thirty-day Internet Protocol (IP) address log for the “Wolfeofwallstreet” account. In response to a request for records associated with two of the IP logins, Comcast provided subscriber information that listed the service address as TILAHUN’s residence and the subscriber as W. TILAHUN, who is TILAHUN’s father.

8. Based on all the facts set forth in this affidavit, I believe that TILAHUN is the user of the “Wolfeofwallstreet” Kik account.

Execution of Federal Search Warrant

9. On April 20, 2021, at approximately 6:08 a.m., HSI agents executed the search warrant. HSI agents encountered four household members inside the residence, including TILAHUN. TILAHUN lives at the Quincy residence with his mother as well as with his aunt and uncle.

10. TILAHUN agreed to speak with agents. Around 6:26 a.m., agents advised TILAHUN of his *Miranda* rights and TILAHUN waived those rights. TILAHUN denied accessing child pornography. He also claimed that his phone and iCloud account may have been hacked. TILAHUN acknowledged using the Kik messenger application in the past before attending college and advised that he no longer had the Kik messenger application installed on his phones. TILAHUN told agents that he may have installed the Kik application as early as 2010 or 2012 and that he had not used the “Wolfeofwallstreet” username. He similarly denied using the wolfeofwallstreet@gmail.com account.

11. During the search of the residence, agents located several electronic devices that belong to TILAHUN. In TILAHUN’s bedroom, agents found an iPhone 11 Pro Max next to the

bed and an iPhone X in the bedroom closet between piles of folded clothes. In the basement, agents found a MacBook Pro laptop computer on a sofa. TILAHUN provided the password for the laptop. TILAHUN told agents that he and other household members used the laptop; however, as set forth below, the forensic analysis of the laptop indicates that TILAHUN was the primary user.

12. At the conclusion of the search, HSI agents transported the evidence, including the aforementioned electronic devices, to the HSI Boston Computer Forensics Laboratory for forensic analysis.

Preliminary Forensic Analysis of Electronic Devices

13. During a preliminary forensic examination of the MacBook Pro laptop, a forensic agent located identifying information associated with TILAHUN. The login for the MacBook Pro has username “AWT” and the full name “Andre W Tilahun.” Similarly, forensic agents determined that the email account-- wolfeofwallstreet@gmail.com-- is associated with a Google Chrome account as well as with a Mega³ cloud storage account located on the laptop.

14. Within the MacBook Pro laptop, forensic agents identified a folder containing a backup of the iPhone X found in TILAHUN’s bedroom. The backup took place on August 25, 2020. This backup appears to include information associated with at least some of the native and third-party applications that were installed on the iPhone X, including, among other things, a Kik messenger account associated with the username “Wolfeofwallstreet.” During the review of the iPhone X backup, the forensic agent identified a device and display name of “andre tilahun”

³ Mega is a cloud storage and file hosting service offered by Mega Limited, a New Zealand based company. Mega provides remote server space and end-to-end encryption, where users may privately store and share their files. The service is offered through web interface, desktop clients for Windows or Mac, and smartphone apps for Android and iOS. A unique feature offered by Mega is a text and video chat tool, which is also fully encrypted.

associated with the iPhone X. Additionally, the agent located a unique device identifier for the iPhone X in the backup, which matches the device identifier for the seized iPhone X.

15. During the forensic examination of the MacBook Pro laptop, the agent reviewed several Kik chats within the iPhone X backup. In this review, the agent observed that the account associated with the iPhone X was listed as “local user” in the Kik chats. Conversely, when reviewing several of these same Kik chats in an extracted copy of the iPhone X, the agent observed that the account associated with the iPhone X was listed by the username, “Wolfeofwallstreet.”⁴ Accordingly, the forensic agent believes that the “local user” in the iPhone X backup is the same user as the “Wolfeofwallstreet” listed in the iPhone X extraction.

Sharing of Child Pornography in Kik Chatroom

16. In the iPhone backup, law enforcement identified an unnamed Kik chatroom that began on approximately May 20, 2020 and concluded on approximately August 17, 2020. The group chatroom consisted of approximately 162 participants. I and other agents have reviewed the group chatroom and determined that its participants, including TILAHUN, used the chatroom to exchange child pornography.

17. On May 24, 2020, participants in the Kik chatroom shared several images of child pornography. These images are described below. TILAHUN received all of these images that same day at 10:18:58 PM (UTC-4:00).⁵

⁴ The messages preserved in the iPhone X backup on the MacBook Pro contain images of child pornography, which were, on occasion, no longer accessible when reviewing the extracted copy of the iPhone X. Accordingly, I have largely relied on the review of the iPhone X backup on the MacBook Pro for the purposes of this affidavit.

⁵ To avoid unnecessary in-person interaction given the health concerns posed by the current pandemic, I am not providing a copy of this image to the Court. I am aware that the “preferred practice” in the First Circuit is that a magistrate judge view images that agents believe constitute child pornography by virtue of their lascivious exhibition of a child’s genitals. *United States v.*

- a. User 1⁶ sent the following image at 3:44:24 PM (UTC-4:00): a prepubescent female child, approximately 2 to 3 years of age, lying naked on her back with her legs in the air and vagina prominently displayed. The focus of the image is the child's vagina and depicts an adult penis penetrating her anus.
- b. User 2 sent the following image at 7:17:24 PM (UTC-4:00): a female child, approximately eight to ten years of age, who is unclothed except for a small article of clothing covering her chest. The child's legs are spread apart exposing her vagina. The focus of the image is the child's clearly prepubescent vagina.
- c. User 3 sent three files that depict nude prepubescent female minors at 8:27 PM (UTC-4:00).

18. On May 24, 2020 at 10:41:45 PM (UTC-4:00), after receiving the aforementioned images of child pornography, “Local User” (i.e. TILAHUN) responded with the comment “*nice.*”
19. On July 14, 2020, at 3:20:11 PM (UTC-4:00), “Local User” (i.e. TILAHUN) sent the following message to the chatroom: “*Anyone have any black girls?*”

- a. In response, User 4 sent the following image, which was received by “local user”

Brunette, 256 F.3d 14, 18-19 (1st Cir. 2001). Here, however, the description offered “convey[s] to the magistrate more than [my] mere opinion that the imag[e] constitute[s] child pornography.” *United States v. Burdulis*, 753 F. 3d 255, 261 (1st Cir. 2014) (distinguishing *Brunette*). The description of certain images here is sufficiently specific as to the age and appearance of the alleged child and the type of sexual conduct he is engaged in that the Court need not view the file to find that it depicts child pornography. *See United States v. Syphers*, 426 F.3d 461, 467 (1st Cir. 2005) (“The best practice is for an applicant seeking a warrant based on images of alleged child pornography is for an applicant to append the images *or provide a sufficiently specific description of the images* to enable the magistrate judge to determine independently whether they probably depict real children.”) (emphasis added). For example, the image described in Paragraph 13(a) clearly depicts a child well under 18 engaging in anal sex, which clearly constitutes child pornography.

⁶ The real names of all Users listed in this chat are known to law enforcement but are being anonymized in order to protect the ongoing investigation.

at 3:26:28 PM (UTC-4:00): two prepubescent minor females standing next to one another and bending forward at the waist, away from the camera. Both prepubescent female minors have their underwear pulled down and are using their hands to spread their buttocks apart, exposing their genitals.

CONCLUSION

20. Based on all of the foregoing, I submit that there is probable cause to believe that on or about May 24, 2020, TILAHUN knowingly received, and attempted to receive, any child pornography, as defined in Title 18, United States Code, section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2).

Sworn to under the pains and penalties of perjury,



Special Agent Janet Connolly
Homeland Security Investigations

Sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on May 3, 2021.

